As an amateur radio operator I have a number of comments and concerns regarding the Broadband over Power Line (BPL) proposal. Your own docket states "Given the fact that there is significant disagreement regarding the interference potential of Access BPL ..." which indicates that there has been insufficient research and testing of this technology prior to implimenting it. Evidence gathered by the ARRL and others indicates that there is unacceptable interference to licensed radio services occurring in presently operating BPL systems which supposedly are operating under Part 15 emissions limits. Such evidence supports having emission limit ceilings below those currently allowed. I have sensitive radio receivers and high-gain antennas located less than 100 meters from a neighborhood power distribution line. Emission properties and levels must be researched and measured by independent third parties which do not have a vested interest in the systems they are checking. Likewise, the potential for interference TO BPL signals by licensed radio services also has not been adequately researched and documented. What would happen to the broadband signals being received by my neighbors if I transmited on any one of several amateur bands within the BPL range of frequencies using the 1500 watts PEP that I am allowed under my FCC license? Preliminary findings by the Amateur Radio Research and Development Corporation (and filed with the FCC)indicate that BPL service within a half mile radius could potentially be disrupted.

Your proposal to have local interference problems of either kind resolved by the BPL service provider and the affected radio service on a voluntary basis is unwise. Power companies that plunge ahead implimenting BPL without regard for possible (and likely unknown) interference problems will not be eager to incorporate expensive mitigation equipment and techniques once their equipment is in place and they have paying customers on the system. The FCC MUST guarantee licensed radio services adversely affected by BPL that it will immediately, directly, and firmly take action against the offender and not allow a situation where an amateur radio operator or other radio service has to go to court to defend their licensed operating privledges. If the BPL service provider needs to cease operations, so be it. What will happen if a power company impliments a BPL system in a city or part of a city where there is currently no amateur radio operator or other licensed radio service and therefore it does not see the need to utilize the more expensive equipment required to notch out or otherwise mitigate potentially interfering frequencies - then later a licensed radio service inhabits the area and interference problems develop? Will the FCC's "protection" stipulations apply?

I firmly believe that the advantages of BPL have been overstated, especially when weighed against the financial cost involved for an interference-free system. I also question its capability for extending broadband service to rural areas as was recently championed by President Bush. How can this be efficient when the signal needs to be reinjected into the power line every few thousand feet? Why not just run cable service along on the power poles?

I would urge the following:
1. The BPL technology not be adopted in the US except perhaps in

some very limited and special circumstances.
2. If it is adopted, the interference measurement techniques and standards be fully researched, strictly defined, and based on the best technology available.
3. The power line radiation limits under Part 15 be reduced to those proposed by the ARRL.
4. ALL systems installed must have the FCC-proposed mitigation, modification, and shutdown features in place BEFORE operation can begin.

Amateur radio operation is not only a hobby but provides essential communications capability in times of disasters and national emergency. Most of us have a significant investment in sensitive, high quality radio equipment that can provide emergency communications locally, nationwide, or worldwide if necessary in cooperation with FEMA centers, the Red Cross, or other public service organizations when standard commercial systems fail or are overloaded. To render this resource mostly useless or unavailable (because amateurs no longer invest in the equipment) by the implementation of a hastily devised and poorly engineered BPL service would be a diservice to our nation.

On a further note, I would urge that NO BPL signals be allowed in the AM broadcast band because some of us like to listen to other stations in addition to the local ones.